

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re: AUTOMOTIVE PARTS ANTITRUST LITIGATION)	Master File No.: 12-md-02311 Honorable Marianne O. Battani Special Master Gene J. Esshaki
In Re: All Auto Parts Cases)	2:12-MD-02311-MOB-MKM
THIS DOCUMENT RELATES TO: ALL AUTO PARTS CASES)	

**REPLY DECLARATION OF SCOTT M. ABELES IN SUPPORT OF
CERTAIN SSEs' OBJECTIONS TO THE SPECIAL MASTER'S APRIL 20, 2016
ORDER REGARDING 30(b)(6) DEPOSITIONS**

I, Scott M. Abeles, declare as follows:

I am an attorney at Proskauer Rose LLP, counsel for FCA US LLC and Fiat Chrysler Finance North America, Inc. I make this Declaration to place before the Court true and correct copies of the following exhibits in further support of certain Specified Subpoenaed Entities' ("SSEs") Objections to the Special Master's Order regarding discovery and non-party depositions:

Exhibit

4. December 18, 2015 letter from C. Kass (SSEs) to S. Klein (Parties).
5. December 24, 2015 email from H. Novison (Parties) to C. Kass (SSEs).
6. December 30, 2015 letter from C. Kass (SSEs) to S. Klein (Parties).

Executed on May 23, 2016

/s/ Scott M. Abeles
Scott M. Abeles